

## REMARKS

The application includes claims 1-22 prior to entering this amendment.

The examiner rejected claim 3 under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement.

The examiner rejected claims 6 and 21 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention.

The examiner rejected claims 8, 9, and 15 under 35 U.S.C. § 102(b) as being anticipated by Busch, *et al.* (WIPO 2002/035376).

The examiner rejected claims 1-5, 7, and 22 under 35 U.S.C. § 103(a) as being unpatentable over Li (U.S. Patent No. 6,480,843) in view of Busch.

The examiner rejected claims 6 and 21 under 35 U.S.C. § 103(a) as being unpatentable over Li in view of Busch as applied to claim 4 above, and further in view of Madhavan, *et al.* ("Semantic Mappings for Data Meditation").

The examiner rejected claims 11-14 and 17-18 under 35 U.S.C. § 103(a) as being unpatentable over Busch in view of Li.

The examiner rejected claims 10 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Busch in view of Li and Wakefield, *et al.* (U.S. Patent Application Publication No. 2004/0167870).

The examiner rejected claim 19 under 35 U.S.C. § 103(a) as being unpatentable over Li and Busch as applied to claim 1, and further in view of Starzl, *et al.* (U.S. Patent Application Publication No. 2002/0103809).

The examiner rejected claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Li and Busch as applied to claim 1, and further in view of Hwang, *et al.* (U.S. Patent Application Publication No. 2002/0078090).

The applicants cancel claims 1-22.

The applicants add new claims 23-54. The new claims are fully supported in the specification, for example in [049-069] and [075-077], and in Figs. 1A, 1B, 4B and 5.

The application remains with claims 23-54 after entering this amendment.

The applicants add no new matter and request reconsideration in view of the following remarks. The applicants point out that the claimed subject matter may be patentably distinguished from the cited reference(s) for multiple reasons; however, the following remarks are believed to be sufficient. Likewise, it is noted that the applicants' failure to comment directly upon any of the positions asserted by the Examiner in the office action does not indicate agreement or acquiescence with those asserted positions.

### **Claim Rejections - 35 U.S.C. § 112**

The examiner rejected claim 3 under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement.

The examiner rejected claims 6 and 21 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention.

As claims 3, 6, and 21 have been cancelled, these rejections are moot.

### **Claim Rejections - 35 U.S.C. § 102 and 35 U.S.C. § 103**

The examiner rejected claims 8, 9, and 15 under 35 U.S.C. § 102(b) as being anticipated by Busch.

The examiner rejected claims 1-5, 7, and 22 under 35 U.S.C. § 103(a) as being unpatentable over Li (U.S. Patent 6,480,843) in view of Busch.

The examiner rejected claims 6 and 21 under 35 U.S.C. § 103(a) as being unpatentable over Li in view of Busch as applied to claim 4 above, and further in view of Madhavan.

The examiner rejected claims 11-14 and 17-18 under 35 U.S.C. § 103(a) as being unpatentable over Busch in view of Li.

The examiner rejected claims 10 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Busch in view of Li and Wakefield.

The examiner rejected claim 19 under 35 U.S.C. § 103(a) as being unpatentable over Li and Busch as applied to claim 1, and further in view of Starzl.

The examiner rejected claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Li and Busch as applied to claim 1, and further in view of Hwang.

As claims 1-22 have been cancelled, these rejections are moot.

### New Claims

Independent claim 23 recites (emphasis added):

*a rules engine coupled to the language analysis module to receive the elements and the annotations, the rules engine configured to perform a comparison of a condition of a rule against the elements and the annotations, and to selectively enable an action of the rule based upon a result of the comparison;*

The applicants point out that the rejection of independent claim 1, now cancelled, attempts to read the “rules engine” of independent claim 1 on Li:

a rules engine coupled to said language analysis module to receive said elements and configured to compare a condition of a rule against said elements, said rule configured to perform an action to retrieve information (col. 11, 11.20-36, teaches, after receiving said elements, "relevant words of semantic similarity and syntactic co-occurrence relationship are determined from tables in Fig. 3");<sup>1</sup>

The cited portion of Li is not a “rules engine” as recited in the applicants’ claim 23, but is merely a table look-up to expand a query. For example, Li does not describe “the rules engine configured to perform a comparison of a condition of a rule against the elements and the annotations, and to selectively enable an action of the rule based upon a result of the comparison” as recited (emphasis added) in the applicants’ claim 23.

The applicants also point out that while several of the cited references mention “rules,” none of the cited references teach or suggest a “rules engine” as recited in claim 23. For example, Wakefield teaches rules for building an index:

A collection of logical rules may be advantageously utilized to perform this function, replacing the extracted terms so that the final database will contain consistent results. Those rules may match an expressed attribute on the bases of an exact string match, a regular expression match, or semantic class match.<sup>2</sup>

And Starzl teaches “thesaurus keyterm addition rules” which simply expand a query based on a thesaurus (a one-to-many expansion where a word in the query may be replaced by one or more equivalent words as part of a thesaurus look-up).<sup>3</sup>

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<sup>1</sup> Office Action, page 3.

<sup>2</sup> Wakefield, [095].

<sup>3</sup> Starzl, [085].

None of the cited references, however, teach or suggest “a rules engine ... configured to perform a comparison of a condition of a rule against the elements and the annotations, and to selectively enable an action of the rule based upon a result of the comparison” (emphasis added), as recited in claim 23.

For at least this reason, claim 23 is in condition for the examiner’s allowance.

Independent claims 33 and 44 include at least some elements similar to independent claim 23, and are therefore in condition for the examiner’s allowance for at least this reason.

Dependent claims 24-32, 34-43, and 45-54 are dependent upon a respective one of independent claims 23, 33 and 44, and are therefore in condition for the examiner’s allowance for at least this reason.

Further, with regard to claim 36 (and also with regard to claim 27 which has at least some similar elements), claim 36 recites (emphasis added):

*in response to a first one of the firing actions, operating the first information retrieval technology;*

*in response to a second one of the firing actions, operating a second distinct one of the information retrieval technologies;*

*providing, via the second one of the information retrieval technologies, a managed answer.*

The applicants point out that none of the cited references teaches or suggest “parsing a query into elements; ... selectively firing a respective action of each of the plurality of rules based ...” where “a first one of the firing actions” operates a “first information retrieval technology” and a “a second one of the firing actions” operates a “second distinct one of the information retrieval technologies.” Dependent claims 36 and 27 are therefore in condition for the examiner’s allowance for at least this reason.

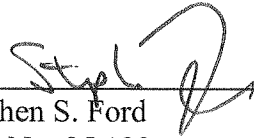
## CONCLUSION

For the foregoing reasons, the applicants request reconsideration and allowance of claims 23-54. The applicants encourage the examiner to telephone the undersigned if it appears that an interview would be helpful in advancing the case.

**Customer No. 73552**

Respectfully submitted,

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